

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC.,)	
a California Corporation,)	
)	
Plaintiff and)	
Counterclaim-Defendant,)	
)	
v.)	
)	C. A. No. 04-1199 (SLR)
INTERNET SECURITY SYSTEMS, INC.,)	
a Delaware Corporation, INTERNET)	
SECURITY SYSTEMS, INC., a Georgia)	PUBLIC VERSION
Corporation, and SYMANTEC)	
CORPORATION, a Delaware Corporation,)	
)	
Defendants and)	
Counterclaim-Plaintiffs.)	

**DECLARATION OF DAVID E. MOORE IN SUPPORT OF
DEFENDANT ISS'S MOTION FOR SUMMARY JUDGMENT
THAT THE ASSERTED CLAIMS OF THE SRI PATENTS-IN-SUIT
ARE NOT INFRINGED OR, IN THE ALTERNATIVE, ARE INVALID**

OF COUNSEL:

Holmes J. Hawkins III
Bradley A. Slutsky
Natasha H. Moffitt
KING & SPALDING LLP
1180 Peachtree Street
Atlanta, GA 30309
Tel: (404) 572-4600

Theresa A. Moehlman
Bhavana Joneja
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Tel.: (212) 556-2100

Richard L. Horwitz (#2246)
David E. Moore (#3983)
POTTER ANDERSON & CORROON LLP
Hercules Plaza 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
rhorwitz@potteranderson.com
dmoore@potteranderson.com

*Attorneys for Defendants
INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation; and
INTERNET SECURITY SYSTEMS, INC.,
a Georgia corporation*

Dated: June 16, 2006

Public Version Dated: June 22, 2006

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a
California Corporation,

Plaintiff,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware Corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
Corporation, and SYMANTEC
CORPORATION, a Delaware Corporation,

Defendants and
Counterclaim-Plaintiffs.

DECLARATION OF DAVID E. MOORE

I, David E. Moore, hereby declare as follows:

1. I am associated with Potter, Anderson & Carroon LLP, counsel of record in this action for Internet Security Systems, Inc. I make this Declaration in support of “Opening Brief in Support of Defendant ISS’s Motion For Summary Judgment that the Asserted Claims of the SRI Patents-in-Suit are not Infringed or, in the Alternative, are Invalid” and would and could competently testify to the matters set forth below if called upon to do so.

2. Attached hereto as Exhibits A-D are true and correct copies of U.S. Patent Nos. 6,484,203 (“the ‘203 patent”), 6,711,615 (“the ‘615 patent”), 6,708,212 (“the ‘212 patent”) and 6,321,338 (“the ‘338 patent”).

3. Attached hereto as Exhibit E are true and correct copies of selected pages of the Deposition Transcript of Dr. George Kesidis.

4.

REDACTED

5.

6. Attached hereto as Exhibit H is a true and correct copy of the Security Focus website, <http://www.securityfocus.com/infocus/1796>, printed on June 16, 2006.

7.

REDACTED

8. Attached hereto as Exhibit J is a true and correct copy of the invalidity chart submitted in the report of ISS's expert Stephen E. Smaha. The cover pages to the invalidity charts reference prior art documents. Many of these references are attached to the June 6, 2006 Declaration of Don Hall. The cover pages attached to Exhibit J have been annotated to provide reference those exhibits.

EXECUTED this 16th day of June, 2006 in Wilmington, Delaware.

/s/ David E. Moore

David E. Moore

Public Version Dated: June 22, 2006

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on June 22, 2006, the foregoing document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

John Horvath
Fish & Richardson P.C.
919 N. Market Street, Suite 1100
P. O. Box 1114
Wilmington, DE 19899

Richard K. Herrmann
Morris James Hitchens & Williams LLP
222 Delaware Avenue, 10th Floor
P.O. Box 2306
Wilmington, DE 19899-2306

I hereby certify that on June 22, 2006, I have Federal Expressed the attached document to the following non-registered participants:

Howard G. Pollack
Michael J. Curley
Fish & Richardson P.C.
500 Arguello Street, Suite 500
Redwood City, CA 94063
pollack@fr.com
curley@fr.com

Paul S. Grewal
Day Casebeer Madrid & Batchelder LLP
20300 Stevens Creek Boulevard
Suite 400
Cupertino, CA 95014
pgrewal@daycasebeer.com

/s/ David E. Moore
Richard L. Horwitz
David E. Moore
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19899-0951
(302) 984-6000
rhorwitz@potteranderson.com
dmoore@potteranderson.com